

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

Anja Salamack,
Plaintiff

3:24-cv-33

v.

Northshore VI, LLC, and
Steven Shore
Defendants

DECLARATION OF MICHAEL SHEESLEY

I, Michael Sheesley, pursuant to *V.I. R. Civ. P. 84*, and 28 USC §1746 certify, subscribe and affirm under penalty of perjury under the laws of the United States of America and the United States Virgin Islands that:

1. I am the attorney for the plaintiff in the above captioned action.
2. I am making this declaration in support of the Emergency Motion For Partial Enforcement Of Settlement Agreement
3. The Defendants' counsel, Attorney Clive Rivers, are in possession of the signed and attested deed in lieu of foreclosure for 17-5B Estate St. Peter (the "Property").
4. My office paid the property taxes for the Property (in the amount of \$8,945.59) on April 22, 2025 and obtained the tax clearance letter for the Property so that the deed can be recorded.
5. Despite repeated requests the Defendants refuse to provide the deed to the Property for recording.
6. The Plaintiff needs a recorded deed in order to have WAPA power turned on to the Property.

7. The Plaintiff has inspected the Property and it is severely damaged, power must be turned on to the Property to prevent further mold accumulation and further damage.
8. The Plaintiff does not reside in the U.S. Virgin Islands and is scheduled to leave island on Friday, April 25, 2025.
9. The Defendants' counsel previously refused to communicate with Plaintiff's counsel and a conference was held with Judge Teague on April 17, 2025 in order for Plaintiff to confirm access to the Property when she arrived in the U.S. Virgin Islands on April 20, 2025.
10. The Defendants owe hundreds of thousands of dollars in fees and costs associated with the defaults on the notes associated with the Property.
11. The Defendants have caused significant damages to the Property.
12. The Defendants are seemingly insolvent and do not have any ability to pay the amounts owed for the additional damages to the Property – which are significant.
13. The Defendants will not be harmed by providing the deed to the Property and permitting Plaintiff to record the same.

I subscribe and affirm under penalty of perjury under the laws of the United States of America (and/or U.S. Virgin Islands) that the foregoing is true and correct.

Executed on April 23, 2025.



Michael Sheesley